



ATLANTA CINCINNATI COLUMBUS LOS ANGELES WASHINGTON, D.C.
CHICAGO CLEVELAND DAYTON NEW YORK

VIA CM/ECF

April 3, 2025

Hon. Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *State of New York v. Puff Bar, et al.*; Civil Action No. 25-cv-1445-MMG
Opposed Letter Motion for Extension of Time for Rule 16 Scheduling Conference

Dear Judge Garnett:

We represent Defendants 10 Days, Inc., Ecto World LLC, Magellan Technology Inc., Midwest Goods Inc., SV3, LLC, and Safa Goods LLC in the above-referenced action. Counsel for all other defendants have indicated that they also join in this letter motion. Plaintiff, The State of New York by Letitia James ("Plaintiff") has indicated that it opposes this letter motion.

We write to request a 30-day postponement of the Federal Rule of Civil Procedure Rule 16 Scheduling Conference currently scheduled for April 23, 2025. Pursuant to an agreement of the parties, all Defendants plan to file their responses to the complaint by a unified response date of May 9, 2024 (*see* Letter Motion filed by the Plaintiff at ECF 40). All Defendants plan to file a joint motion to transfer venue to the Western District of New York because, *inter alia*, no defendants are domiciled in the Southern District of New York. All Defendants also plan to file motions to dismiss or are contemplating joining the other Defendants' motions to dismiss. Defendants believe the Court will benefit from being able to review these motions prior to holding the Scheduling Conference.

There has been no previous request for an adjournment of the Scheduling Conference or any other deadline or event in this case. Plaintiff has not consented to this letter motion and stated in an email on March 27, 2025, that it saw no reason for such a delay. Defendants respectfully request that the Court grant this extension.

Respectfully submitted,

/s/ *Krupa Patel*

Krupa Patel
Thompson Hine LLP

cc: All counsel of record (via ECF)

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